

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Plaintiff,

Index No:21-CR-265 (PKC)

-against-

HU JI,
LI MINJUN,
TU LAN,
ZHU FENG,
also known as "Johnny Zhu,"
KUANG ZEBIN
MICHAEL MCMAHON
ZHUAI YONGQIANG
ZHENG GONGYING AND
ZHU YONG,
also known as "Jason Zhu,"

Defendants.

**NOTICE OF MOTION TO
EXCLUDE STATEMENTS
AND EVIDENCE
OBTAINED IN
VIOLATION OF
DEFENDANT'S
MIRANDA RIGHTS**

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TO: All Counsel of Record:

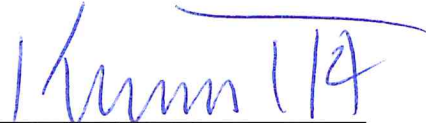
PLEASE TAKE NOTICE that Defendant Zhu Yong, by and through his counsel, KEVIN KERVENG TUNG, P.C. (Kevin K. Tung, Esq. appearing), shall move before the Honorable Pamela K. Chen, United States District Judge for the Eastern District of New York, at 225 Casman Plaza East, Brooklyn, New York 11201, on a date to be set by the Court, for the entry of an order granting Defendant Zhu Yong's Motion in limine to Exclude Statements and Evidence Obtained In Violation of Defendant's Miranda Rights.

PLEASE TAKE FURTHER NOTICE that in support of this motion, defendant Zhu Yong shall rely upon the accompanying Memorandum of Law in Support of Defendant's Zhu Yong's Motion in Limine to exclude statements and evidence filed herewith.

Dated: April 10, 2023

Respectfully submitted.

KEVIN KERVENG TUNG, P.C.
Attorneys for the defendant Zhu Yong

A handwritten signature in blue ink, appearing to read "Kevin K. Tung", with a horizontal line drawn above it.

By: Kevin K. Tung, Esq. (KT-1478)
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